omissions. From the remaining franchises, it then retained all randomly selected primary franchises and all franchises satisfying the "effective competition" criteria.

The FCC designated three tests to determine whether a franchise area is characterized by effective competition. An area qualified as "competitive" if it satisfied any of those conditions, which the FCC refers to as categories A, B, and C.

Category A: Service penetration in the franchise area is no greater than

30%

Category B: Competing systems serve the franchise area1

Category C: A municipally-owned system serves the franchise area<sup>2</sup>

For brevity, I will refer to these criteria of competition as, respectively, 30% penetration, overbuilds, and municipal systems. The prices charged in these "competitive" franchise areas provide the key raw data from which the FCC developed its benchmark prices.

	The benchmarks themse	lves are expressed in	n terms of the average	nrice	
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E CONTRACTOR					
					=
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-					=
					_

to the estimated price — the benchmark — that a comparable "competitive" system would charge. In the example below, the weighted average price per channel is  $82.9\phi$ , according to the FCC formula, which involves dividing the subscriber-weighted average price by the subscriber-weighted number of channels. The subscriber-weighted price is \$11.60 (10 x 500/500 + 8 x 100/500 = 11.6) and the subscriber-weighted number of channels is 14 (10 x 500/500 + 20 x 100/500 = 14), which gives  $82.9\phi$  (\$11.60/14 =  $82.9\phi$ ).

<u>Tier</u>	<u>Price</u>	<u>Subscribers</u>	<u>Channels</u>
Basic	<b>\$</b> 10	500	10
Expanded Basic	\$8	100	20

Using the sub-sample of the cable system franchises it selected, the FCC developed its benchmarks by estimating an equation relating the average price per channel charged by a cable system in a franchise area, calculated in this fashion, to four factors: (1) system subscribers, (2) number of channels available in all regulated tiers, (3) number of satellite-delivered channels in all regulated tiers, and (4) whether effective competition exists in the franchise.

The form of the equation estimated by the FCC assumes that the prices charged in a "competitive franchise" are lower by a uniform proportion than the prices charged in a non-competitive franchise by a system offering the same services and having the same number of system-wide subscribers. So, for the purpose of developing benchmarks, the key parameter is this uniform competitive discount. The estimate of the competitive discount obviously depends critically on the service prices charged in the "competitive" franchises in the sample.

The equation estimated by the FCC was translated into a series of tables displaying the benchmark price — the average price per channel that a "competitive" system would be predicted to charge — as a function of attributes of cable systems. Examples of FCC benchmarks for systems having 200 subscribers and 800 subscribers are displayed in the following table.

# Benchmark Price/Channel, 200 Subscribers

_	To	otal Basic Channe	<u> s</u>
Satellite Channels	<u>12</u>	<u>24</u>	<u>50</u>
6	\$1.436	<b>\$</b> 0.776	\$0.404
16		\$0.856	<b>\$</b> 0.446
30			\$0.476

### Benchmark Price/Channel, 800 Subscribers

_	To	otal Basic Channe	<u>ls                                    </u>
Satellite Channels	<u>12</u>	<u>24</u>	<u>50</u>
6	<b>\$</b> 1. <b>3</b> 97	\$0.755	\$0.393
16		\$0.833	\$0.434
30			<b>\$</b> 0.463

### Benchmark Evaluation

For benchmark prices to be reasonable, they must allow the cable systems regulated by them an opportunity to recover the cost of providing cable service, including the cost of capital. If benchmarks prevent a number of cable systems from recovering their costs, the long-term consequence will be a withdrawal of service from those areas, something not in the interest of consumers.

To evaluate whether benchmarks are likely to provide systems with the opportunity to recover their costs, it is helpful to address the following questions.

- 1. Are the data used to construct the benchmarks accurate?
- 2. Are the service prices charged by the "competitive" systems in the sample adequate for those cable systems to recover their costs?
- 3. Is the valid sample of competitive systems sufficiently large to produce a statistically reliable measure of "competitive" prices?
- 4. Do the benchmarks take into account all factors affecting service costs necessary to prevent the benchmark prices from falling below significantly service costs for some cable systems?

It is true that, in the new regulatory environment, a cable system feeling that the benchmark applicable to it is unreasonably low would be afforded the opportunity of justifying its prices by reference to its cost of service. Thus, it might appear that the reasonableness of the benchmark prices should not be of great concern. But that overlooks the consideration that many cable systems, especially small ones, frequently do not have the detailed cost records, extending back in time, that firms accustomed to cost-based rate regulation are

in the practice of keeping. To provide a cost justification of basic service rates, it would be necessary to separate those costs a system incurs in the provision of basic services from the costs it incurs to provide those services not subject to regulation. Moreover, since some of the costs of the current service provided by a cable system were incurred some time in the past, good historical data are necessary to portray accurately the cost of services now being provided by cable systems.

Cable systems often find it impossible or extremely difficult to provide such data. Cost accounts are often kept in terms of functional cost categories, such as service calls, or plant maintenance. Records frequently do not provide enough information to distinguish, within a category, between basic and pay service costs. As for records of assets used to provide current cable service that were acquired in the past, finding cost records containing sufficient detail to reasonably apportion those costs between basic and pay services is even more challenging. When they simply no longer exist, or can only be reclaimed through a time-consuming search, the recourse to a cost-of-service justification may be of little value.

Even those small systems that have maintained and preserved the necessary cost records would have to prepare whatever analyses are required to implement the methodology that is adopted to estimate the cost of regulated services. The burden that would be imposed on such systems of developing a cost-of-service justification makes it quite important that a system of benchmark regulation establish reasonable price caps.

I will now turn to a discussion of what I see as some of the deficiencies of the FCC benchmarks.

### Inaccurate Data

The portrayal of service prices, subscriber numbers and channel carriage contained in the FCC's database is not always accurate. That is clear from spot checks performed under my direction and also from a comparison of the FCC database with a "corrected" version of the database prepared by the National Cable Television Association. It would be very laborious to develop a comprehensive evaluation of the error rates in the FCC database, the average size of the errors, and the effect of those errors on the benchmarks calculated by the FCC. Although such an evaluation would be quite useful, I am not aware that anyone has undertaken it. In its absence, all that can be said is that errors in the FCC data may have led to inappropriate benchmarks.

### 2. Small Sample Size

Of the 377 franchises used to develop the benchmarks, the overwhelming share are "non-competitive", according the FCC's classification scheme. They would have had only a minor effect on the statistical derivation of "competitive" benchmarks -- as indeed should be the case, given the objective of obtaining a benchmark that describes the cable service prices that emerge in competitive markets.

The equation used by the FCC to generate the benchmarks is estimated from a sample containing 45 small "competitive" cable systems. Within the

group of small competitive systems, there are only two representatives of systems having between 500 and 750 subscribers, and only five with between 750 and 1000. There are various ways of quantifying the imprecision introduced by sample size in the development of competitive benchmarks. One useful measure relates to the variable in the FCC's equation characterizing whether or not a service is "competitive".

Table 1: Small Systems in the FCC Sample

			Competitive	· · · · · · · · · · · · · · · · · · ·	
System Subscribers	Not Competitive	30% Penetration	Private Overbuilds	Municipal Markets	Category Total
0 to 50	4	5	0	1	10
50 to 100	5	7	0	0	12
100 to 250	19	7	4	1	31
250 to 500	25	9	0	4	38
500 to 750	15	1	1	0	17
750 to 1000	9	3	2	0	14
TOTAL	77	32	7	6	122

According to the FCC's analysis, service prices are 9% lower in "competitive" franchises, other factors equal. If two systems have identical numbers of subscribers and channels, but one operates in a "competitive" franchise and the other does not, the FCC would predict that service prices in the competitive franchise would be 9% lower. But in actuality, that estimate is subject to uncertainty, which can be quantified. The probability is 95% that franchise competition reduces prices somewhere between 3.5% and 14.1%. In calculating its benchmarks, the FCC has assumed that competition uniformly

# reduces service prices by 9%, which is close to the midpoint of this interval. But we can be 95% sure, according to the FCC's equation, only that prices charged

### 3. Inappropriate Choice of Benchmark Systems

Markets involving municipal cable systems and short-term overbuilds cannot be expected to provide a reliable guide to the prices that characterize sustainable competition between private cable systems. A municipal cable system has cost advantages unavailable to private cable systems, including access to inexpensive finance (tax exempt bonds), use of public rights-of-way at no charge, and exemption from franchise fees and property taxes. These considerations would lead to the expectation that prices charged by municipal systems tend to be lower than the prices charged by competing private cable systems.

That does indeed seem to be true of the cable systems in the FCC database. The "competition" variable in the FCC's benchmark equation indicates whether the system qualifies as being classified as competitive by any of the three FCC tests (30% penetration, private overbuild, municipal system). We replaced that single variable in our analysis by separate variables indicating respectively whether or not the system (a) had a penetration rate of 30% or less, (b) was involved in a private overbuild, or (c) was a municipal system. With that reformulation, we re-estimated the FCC equation. The results revealed that basic service prices charged by municipal systems are almost 15% below prices charged by competing private systems, other factors equal.

It is also questionable whether some of the prices charged by competing private systems provide a suitable basis for developing benchmark prices. Cable overbuilds almost invariably precipitate price wars far more drastic than the price competition that occurs in most markets. The reason is not hard to

find. The fixed costs of providing cable service, which include the distribution system, are quite high. Once those costs are incurred, the variable cost of serving a subscriber is relatively low. When cable systems compete head-to-head, each has an incentive to drop its price as low as the variable cost of service, a low figure, if the alternative is to lose subscribers to the rival cable system.

As a case in point, one of the overbuild cable systems in the FCC database is charging \$1.85 for its second tier, which contains 26 satellite-transmitted channels of programming. We determined the channel line-up (the FCC did not ask for such information) and calculated the programming fees that the system would incur for each tier 2 subscriber. That cost alone, assuming the program fees had been charged at "rate card", would have amounted to over \$2.70 per subscriber -- 50% above the price being charged by the operator for the service. In practice, cable systems sometimes obtain substantial discounts from a channel supplier's rate card. But even then, this case provides a clear

consolidation of the two systems occurs or competition persists, but with each rival increasing its price to a sustainable level.

Evidence of this can be found in the FCC database. We re-estimated a modified version of the FCC equation, using only those cable systems involved in an overbuild situation, and we added a variable describing how long competition had persisted in each instance. I found that in franchises where the duration of competition was five years or less, prices were 25% lower than in those franchises where competition had endured more than five years. The statistical reliability of this difference is extremely high, which means there is little doubt that the prices associated with short-term competition are substantially lower than the prices that have emerged from more durable competition.<sup>3</sup>

Removing markets served by municipal systems and short-term overbuilds from the FCC's sample and re-estimating the benchmark equation causes the benchmark prices to increase. The benchmark prices that result, which are reported in the appendix, exceed the FCC's benchmarks by an amount that varies with system size and the channels provided in the basic

<sup>&</sup>lt;sup>3</sup> There is no hard and fast rule governing how long price wars may persist. In some settings, such as gas station competition, spasmodic price wars may recur over very protracted periods of time. But the price wars conducted by competing cable systems appear to be characterized by holding prices very low over sustained periods of times rather than intermittent price cuts.

service packages. Depending on those attributes, the benchmarks increase from approximately 7% to 16%.

In order to determine how much the average benchmark price would be raised for systems subject to regulation, we can compare the average price per channel determined by the FCC benchmarks with the corresponding benchmarks when franchises served by municipalities and short-term competitors are excluded. The "noncompetitive" systems in the sample used by the FCC to estimate its benchmarks prices should provide a reasonably accurate profile of the systems that will be subject to regulation. Treating those systems as representative, the average increase in benchmark prices as a result of excluding franchises served by municipal systems and short-term overbuilds can be determined. The results are shown the following table. The higher benchmarks resulting from excluding franchises with short-term competition and

### Small System Benchmarks, Eliminating Questionable Franchise Areas

Excluding franchises where	Increase in Average Benchmark Price
1) competition is recent (5 years or less)	4.0%
2) municipal service is provided	4.2%
3) both (1) and (2)	11%

municipal systems would require 48% of all "non-competitive" systems to lower their rates, if the FCC's sample is representative.

### 4. Benchmark Prediction Errors

charged by regulated systems, the equation must be able to portray accurately the prices charged by the competitive systems intended to serve as the benchmarks. The reason, on reflection, is clear. Suppose that cable systems A and B are identical in every respect, except that B directly competes with another cable system. The general theory of benchmark regulation would then say that the price charged by B provides the appropriate benchmark for regulating A's price. That is true because the two systems provide identical services and operate in identical environments, so the price charged by B should reveal the price that A would charge if it, also, were operating in a competitive market.

But, pursuing this example, the benchmark that the FCC plans to apply to system A is not the price charged by B, but rather the price that the FCC's equation predicts that B charges. That makes it important for the benchmark equation to be able to predict accurately the prices charged by the "competitive" systems. To revert again to the previous example, suppose more concretely that system B charges \$20 per month for basic service, but the FCC's equation predicts that it charges \$16 per month. Then system A would be limited to a \$16 price, even though the correct benchmark is \$20. This problem would not arise, obviously, if the equation correctly predicted the prices charged by competitive systems. Whether the FCC equation does accurately predict "competitive" prices is therefore quite important.

In order to accurately predict competitive service prices, it is necessary to take into account all of the factors significantly influencing price formation in competitive markets. For example, cable distribution plant installed underground is considerably more expensive that aerial distribution, and the proportion of plant underground varies widely from one system to another. If that factor has an important influence on prices charged in competitive markets, but is ignored by the equation used to predict competitive service prices, it is quite unlikely that the predictions made by the equation would be very accurate. The FCC equation predicts service prices in competitive markets by taking into account only three factors: the number of subscribers, the number of channels, and the number of satellite-delivered channels.

Whether those three variables are adequate to accurately predict competitive prices is ultimately an empirical matter. The ideal test would be to draw a new, random sample of "competitive" cable systems and determine how accurately their prices are predicted by the FCC equation. An easier test is to examine how well the equation predicts the prices of "competitive" systems in its database. Since the equation estimated by the FCC is based importantly on those particular systems, I would expect it to predict those prices more accurately than prices charged by a new sample of competitive cable systems, or competitive systems in general. In other words, if the equation does not predict accurately the prices of competitive systems in the sample from which it was estimated, it is even less likely to do so when applied to competitive systems in general.

A comparison of the prices charged by small competitive cable systems in the FCC sample with the prices predicted for those systems by the FCC equation reveals some large errors. The FCC's benchmark equation is incapable of accounting for almost one-half of the price variations among small cable systems. Of the 45 small competitive cable systems in the FCC sample, the FCC's benchmark equation understates the prices charged by 20 of the systems and overstates the prices of the remainder. Both types of errors, of course, are undesirable. But errors in the direction of understating the prices actually charged by the benchmark systems are more serious, since they raise the possibility that comparable systems subject to regulation will be incapable of recovering their costs, and thus threatened with the prospect of going out of business.

The outcome that 20 of the 45 small competitive systems used by the FCC are themselves above the FCC benchmarks can be viewed from a different perspective. Although "noncompetitive" systems charging the same rates would have to reduce their prices, the "competitive" systems do not.

Of the 20 small competitive systems with higher than predicted rates, their prices exceeded by 26% the prices predicted by the FCC equation, on average. To examine these underestimates in more detail, I arranged the 20 cable systems in the order of how much their prices exceeded the predicted prices, and then divided the ordered list into groups of five. I then calculated, for each group of five, the average amount by which the actual price exceeded the price predicted by the FCC. The results are displayed on the following table.

# Actual Competitive Prices Relative to Benchmark Prices

1st Quartile	4.2%	higher
2nd Quartile	12.3%	higher
3rd Quartile	17.4%	higher
4th Quartile	85.6%	higher

Systems in the lowest quartile charge prices that exceed the FCC benchmarks by an average of 4%. But prices charged by competitive systems in the fourth quartile are fully 85% above the FCC's benchmarks. It is difficult to resist the conclusion that, in such instances, the FCC benchmarks would deprive small cable systems of the opportunity to recover the cost of providing service.

William Shew

Executed on June 18, 1993

Appendix A

# Systems with 50 subscribers, 5 to 24 channels: Prices per Channel

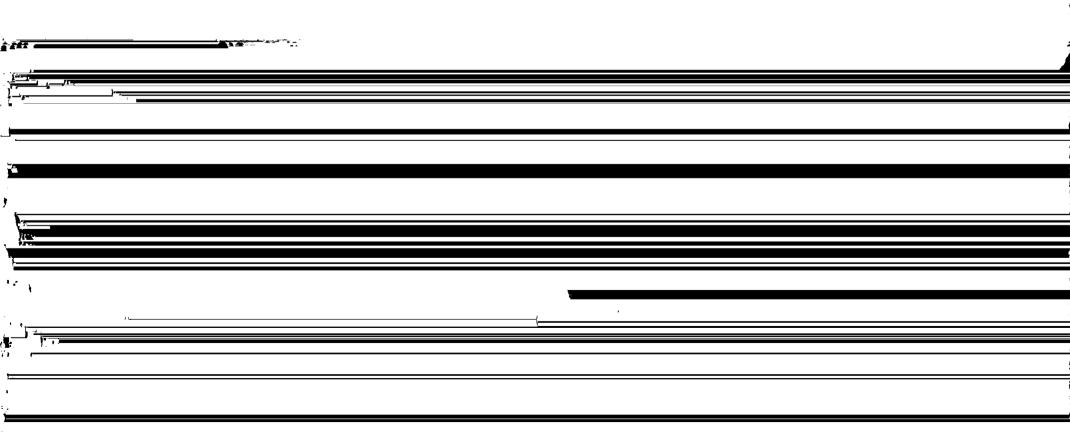
Satellite	Total o	hannel	s on reg	ulated	tiers																Satellite
Channels	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Channels
0	\$2.914	\$2.490	\$2.180	\$1.942	\$1.755	\$1.602	\$1.476	\$1.369	\$1.277	\$1.198	\$1.129	\$1.068	\$1.013	\$0.965	\$0.921	\$0.881	\$0.844	\$0.811	\$0.781	\$0.752	1 0
1	\$2.914	\$2.490	\$2.180	\$1.942	\$1.755	\$1.602	\$1.476	\$1.369	\$1.277	\$1.198	\$1.129	\$1.068	\$1.013	\$0.965	\$0.921	\$0.881	\$0.844	\$0.811	\$0.781	\$0.752	1
2	\$3.193	\$2.728	\$2.388	\$2.128	\$1.923	\$1.755	\$1.617	\$1.500	\$1.400	\$1.313	\$1.237	\$1.170	\$1.110	\$1.057	\$1.009	\$0.965	\$0.925	\$0.889	\$0.855	\$0.824	2
3	\$3.368	\$2.878	\$2.519	\$2.245	\$2.028	\$1.852	\$1.706	\$1.582	\$1.476	\$1.385	\$1.305	\$1.234	\$1.171	\$1.115	\$1.064	\$1.018	\$0.976	\$0.938	\$0.902	\$0.870	3
4	\$3.499	\$2.989	\$2.617	\$2.332	\$2.106	\$1.923	\$1.771	\$1.643	\$1.534	\$1.439	\$1.355	\$1.282	\$1.217	\$1.158	\$1.105	\$1.057	\$1.014	\$0.974	\$0.937	\$0.903	4
5	\$3.603	\$3.078	\$2.695	\$2.401	\$2.169	\$1.981	\$1.824	\$1.692	\$1.579	\$1.481	\$1.396	\$1.320	\$1.253	\$1.193	\$1.138	\$1.089	\$1.044	\$1.003	\$0.965	\$0.930	5
6		\$3.153	\$2.760	\$2.460	\$2.222	\$2.029	\$1.869	\$1.733	\$1.618	\$1.517	\$1.430	\$1.352	\$1.283	\$1.222	\$1.166	\$1.115	\$1.069	\$1.027	\$0.989	\$0.953	6
7	1		\$2.817	\$2.510	\$2.268	\$2.071	\$1.907	\$1.769	\$1.651	\$1.549	\$1.459	\$1.380	\$1.310	\$1.247	\$1.190	\$1.138	\$1.091	\$1.048	\$1.009	\$0.972	7
8				\$2.555	•	\$2.107	•	-	•	•	-	-	•	•	•	•	•	•	\$1.027	\$0.990	8
9	1				\$2.344	\$2.140	•								•		•	<b>.</b>	\$1.043		9
10	1					\$2.170	\$1.999	\$1.854	\$1.730	\$1.623	\$1.529	\$1.446	\$1.373	\$1.307	\$1.247	\$1.193	\$1.144	\$1.099	\$1.057	\$1.019	10
11	1						\$2.024		•						•		• –	•	\$1.071		<b>j 1</b> 1
12	1							\$1.899	•	-		-	•	•	•	•	• -	• -	\$1.083		12
13	1								\$1.791				•	•		•	•	<b>*</b> · · · · · ·	\$1.095		13
14	Ĭ									\$1.697						•	-	•	\$1.105		14
15	1										\$1.613						-	•	\$1.115		15
16	ł											\$1.539		-	•	•	•	•	\$1.125		16
17	1												\$1.472						\$1.134		17
18	1													\$1.412	-	•	-	•	\$1.143	•	j 18
19	l														\$1.357				\$1.151		19
20	1															\$1.307			\$1.159		20
21	1																\$1.261		<b>\$1.166</b>		21
22	1																	\$1.219	\$1.173		22
23																			\$1.180	\$1.138	23
24	<u> </u>																			\$1.144	24
	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
	Total o	hannel	s on rec	gulated	tiers																1

# Systems with 100 subscribers, 5 to 24 channels: Prices per Channel

Satellite	Total c	hannel	s on reg	gulated	tiers									<del></del>							Satellite
Channels	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Channels
0	\$2.707	\$2.313	\$2.025	\$1.804	\$1.630	\$1.488	\$1.371	\$1.271	\$1.187	\$1.113	\$1.049	\$0.992	\$0.941	\$0.896	\$0.855	\$0.818	\$0.784	\$0.753	\$0.725	\$0.699	] 0
1	\$2.707	\$2.313	\$2.025	\$1.804	\$1.630	\$1.488	\$1.371	\$1.271	\$1.187	\$1.113	\$1.049	\$0.992	\$0.941	\$0.896	\$0.855	\$0.818	\$0.784	\$0.753	\$0.725	\$0.699	1
	1	\$2.534	\$2.218	\$1.977	\$1.786			-			\$1.149			\$0.982		\$0.896	\$0.859	\$0.826	\$0.794	\$0.766	2
3	\$3.129	\$2.673	<b>4</b>	<b>+</b>	<b>Ψ-</b> .	+	\$1.584	•			\$1.212		· · ·	\$1.036		\$0.946	\$0.907	\$0.871	\$0.838	\$0.808	3
4	1	\$2.776	\$2.431	•	•		•		•		\$1.259						\$0.942	\$0.905	\$0.870	\$0.839	4
i	\$3.347			-	<b>+</b>	+	T		*	,	\$1.296	¥	T	4			\$0.970	\$0.932	\$0.896	\$0.864	5
6	1	\$2.929	<b>—</b>	\$2.285	<b>—</b>	+				-	\$1.328		•	•		-	\$0.993	\$0.954	\$0.918	\$0.885	6
7	}		\$2.617		•	•	*		•		\$1.355	•	•	•	•		\$1.014		\$0.937	\$0.903	7
8	)			\$2.373	<b>T</b>		\$1.803	•			\$1.379					-			\$0.954	\$0.919	8
9	]				\$2.177	\$1.988					\$1.401	•			•			•	\$0.969	\$0.934	9
10	Ĭ					\$2.016	\$1.857				\$1.420	*	•	*			\$1.062	•	\$0.982	\$0.947	10
11	1						\$1.000				\$1.438 \$1.455		•		•		\$1.076		\$0.995 \$1.006	\$0.959 \$0.970	11 12
12 13								\$1.704			\$1.433	-					\$1.000		\$1.000	\$0.970	13
13	1								\$1.004		\$1.485					•		-	\$1.017	\$0.990	14
15										Ψ1.570	-		\$1.345						\$1.036	\$0.999	15
16	)										Ψ1.730		\$1.357		•		-		+	<b>7</b> - · · · · ·	16
17	ļ											Ψ1.425	\$1.367	•		•	\$1.139				17
18	]												Ψ1.007				\$1.148	•		\$1.023	18
19	1													J	\$1.261		\$1.156		-	<b>T</b>	1
20	i																\$1.164		•	•	20
21																		\$1.125		•	21
22	}																. –		\$1.090		
23																				\$1.057	
24	j																		,	\$1.063	
	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
	Total	channe	ls on re	gulated	tiers																}

# Systems with 50 subscribers, 25 to 100 channels: Prices per Channel

Satellite	Total o	hannel	s on reç	gulated	tiers												Satellite
Channels	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	 Channels
0	\$0.726	\$0.621	\$0.543	\$0.484	\$0.437	\$0.399	\$0.368	\$0.341	\$0.318	\$0.299	\$0.281	\$0.266	\$0.253	\$0.240	\$0.229	\$0.220	 7 o 1
5	\$0.898	\$0.767	\$0.672	\$0.599	\$0.541	\$0.494	\$0.455	\$0.422	\$0.394	\$0.369	\$0.348	\$0.329	\$0.312	\$0.297	\$0.284	\$0.271	5
10	\$0.984	\$0.841	\$0.736	\$0.656	\$0.592	\$0.541	\$0.498	\$0.462	\$0.431	\$0.405	\$0.381	\$0.361	\$0.342	\$0.326	\$0.311	\$0.297	10
15	\$1.038	\$0.887	\$0.776	\$0.692	\$0.625	\$0.571	\$0.526	\$0.488	\$0.455	\$0.427	\$0.402	\$0.380	\$0.361	\$0.344	\$0.328	\$0.314	15
20	\$1.078	\$0.921	\$0.806	\$0.719	\$0.649	\$0.593	\$0.546	\$0.506	\$0.473	\$0.443	\$0.418	\$0.395	\$0.375	\$0.357	\$0.341	\$0.326	20
25	\$1.110	\$0.949	\$0.830	\$0.740	\$0.668	\$0.610	\$0.562	\$0.521	\$0.487	\$0.457	\$0.430	\$0.407	\$0.386	\$0.367	\$0.351	\$0.336	25
l 30	l	\$0.972	\$0.851	<b>\$</b> 0.758	\$0.685	\$0.625	\$0.576	\$0.534	\$0.499	\$0.468	\$0.441	\$0.417	\$0.395	<b>\$</b> 0.376	\$0.359	\$0.344	30



### Systems with 100 subscribers, 25 to 100 channels: Prices per Channel

Satellite	Total o	hannel	s on reg	gulated	tiers												Satellite
hannels	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	Channels
0	\$0.675	\$0.576	\$0.505	\$0.450	\$0.406	\$0.371	\$0.342	\$0.317	\$0.296	\$0.277	\$0.261	\$0.247	\$0.235	\$0.223	\$0.213	\$0.204	j 0
5	\$0.834	\$0.713	\$0.624	\$0.556	\$0.502	\$0.459	\$0.422	\$0.392	\$0.366	\$0.343	\$0.323	\$0.306	\$0.290	\$0.276	\$0.264	\$0.252	5
10	\$0.914	\$0.781	\$0.684	\$0.609	\$0.550	\$0.502	\$0.463	\$0,429	\$0.401	\$0.376	\$0.354	\$0.335	\$0.318	\$0.303	\$0.289	\$0.276	10
15	\$0.964	\$0.824	\$0.721	\$0.643	\$0.580	\$0.530	\$0.488	\$0.453	\$0.423	\$0.396	\$0.374	\$0.353	\$0.335	\$0.319	\$0.305	\$0.291	15
20	\$1.001	\$0.856	\$0.749	\$0.667	\$0.603	\$0.551	\$0.507	\$0.470	\$0.439	\$0.412	\$0.388	\$0.367	\$0.348	\$0.331	\$0.316	\$0.303	20
25	\$1.031	\$0.881	\$0.771	\$0.687	\$0.621	\$0.567	\$0.522	\$0.484	\$0.452	\$0.424	\$0.400	\$0.378	\$0.359	\$0.341	\$0.326	\$0.312	25
30	ł	\$0.903	\$0.790	\$0.704	\$0.636	\$0.581	\$0.535	\$0.496	\$0.463	\$0.434	\$0.409	\$0.387	\$0.367	\$0.350	\$0.334	\$0.319	30
35	j		\$0.806	\$0.719	\$0.649	\$0.593	\$0,546	\$0.506	\$0.473	\$0.443	\$0.418	\$0.395	\$0.375	\$0.357	\$0.341	\$0.326	35
40	ł			\$0,731	\$0.661	\$0.603	\$0.556	\$0.515	\$0.481	\$0.451	\$0.425	\$0.402	\$0.382	\$0.363	\$0.347	\$0.332	40
45	ł				\$0.671	\$0.613	\$0.564	\$0.523	\$0.488	\$0.458	\$0.432	\$0.408	\$0.387	\$0.369	\$0.352	\$0.337	45
50	İ					\$0.621	\$0.572	\$0.531	\$0.495	\$0.465	\$0.438	\$0.414	\$0.393	\$0.374	\$0.357	\$0.341	50
55	}						\$0.579	\$0.537	\$0.502	\$0.470	\$0.443	\$0.419	\$0.398	\$0.379	\$0.361	\$0.346	55
60	ł							\$0.544	\$0.507	\$0.476	\$0.448	\$0.424	\$0.402	\$0.383	\$0.366	\$0.350	60
65	1								\$0.513	\$0.481	\$0.453	\$0.429	\$0.407	\$0.387	\$0.369	\$0.353	65
70	j									\$0.486	\$0.458	\$0.433	\$0.411	\$0.391	\$0.373	\$0.357	70
75	}										\$0.462	\$0.437	\$0.414	\$0.395	\$0.377	\$0.360	75
80	1											\$0.440	\$0.418	\$0.398	\$0.380	\$0.363	80
85	İ												\$0.421	\$0.401	\$0.383	\$0.366	85
90	}													\$0.404	\$0.386	\$0.369	90
95	}														\$0.388	\$0.372	95
100	ţ															\$0.374	100
	i																i
	1																ł
	}																Ì
	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	 <del> </del>
	1				_	-	-	-			, ,	-	00		55	100	}
	Total	manmer	s on reg	Julawa	neiz												 ]

# Systems with 250 subscribers, 5 to 24 channels: Prices per Channel

atellite	Total c	hannel	s on rec	gulated	tiers										· · · · · · · · · · · · · · · · · · ·						Satellite
hannels	5	6_	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Channels
0	\$2.590	\$2.213	\$1.937	\$1.726	\$1.559	\$1.424	\$1.311	\$1.216	\$1.135	\$1.065	\$1.003	\$0.949	\$0.901	\$0.857	\$0.818	\$0.783	\$0.750	\$0.721	\$0.694	\$0.669	0
1	\$2.590	\$2.213	\$1.937	\$1.726	\$1.559	\$1.424	\$1.311	\$1.216	\$1.135	\$1.065	\$1.003	\$0.949	\$0.901	\$0.857	\$0.818	\$0.783	\$0.750	\$0.721	\$0.694	\$0.669	1
2	\$2.837	+	T		•		\$1.437	•	•	•				\$0.939	\$0.896	\$0.858	\$0.822	\$0.790	\$0.760	\$0.733	2
-	1	•	•		-	•	\$1.516				-	-	•	\$0.991	<b>**</b>	\$0.905	\$0.867	\$0.833	\$0.802	\$0.773	3
4	\$3.109	\$2.656	\$2.325	\$2.072	\$1.872	\$1.709	\$1.574	\$1.460	<b>\$</b> 1. <b>3</b> 63	\$1,278	\$1.204	\$1.139	\$1.081	\$1.029	\$0.982	\$0.940	\$0.901	\$0.865	\$0.833	\$0.803	4
5	\$3.202	\$2.735	\$2.395	\$2.134	\$1.928	\$1.760	\$1.621	\$1.504	\$1.403	\$1.316	\$1.240	\$1.173	\$1.113	\$1.060	\$1.011	\$0.968	\$0.928	\$0.891	\$0.858	\$0.827	<b>5</b>
6	1	\$2.802	\$2.453	\$2.186	\$1.975	\$1.803	\$1.660	\$1.540	\$1.438	\$1.348	\$1.270	\$1.202	\$1.140	\$1.085	\$1.036	\$0.991	\$0.950	\$0.913	\$0.878	\$0.847	6
7	}		\$2.503	\$2.231	\$2.015	\$1.840	\$1.695	\$1.572	\$1.467	\$1.376	\$1.297	\$1.226	\$1.164	\$1.108	\$1.057	\$1.011	\$0.970	\$0.932	\$0.896	\$0.864	7
8	1			\$2.270	\$2.051	\$1.873	\$1.725	\$1.600	\$1.493	\$1.401	\$1.320	\$1.248	\$1.184	\$1.127	\$1.076	\$1.029	\$0.987	\$0.948	\$0.912	\$0.880	8
9	}				\$2.083	\$1.902	\$1.752	\$1.625	\$1.516	\$1.422	\$1.340	\$1.268	\$1.203	\$1.145	\$1.093	\$1.046	\$1.002	\$0.963	\$0.927	\$0.893	9
10	}					\$1.928	\$1.776	\$1.648	\$1.538	\$1.442	\$1.359	\$1.285	\$1.220	\$1.161	\$1.108	\$1.060	\$1.016	\$0.976	\$0.940	\$0.906	10
11	}						\$1.799	\$1.668	\$1.557	\$1.461	\$1.376	\$1.302	\$1.235	\$1.176	\$1.122	\$1.074	\$1.029	\$0.989	\$0.952	\$0.917	11
12	ł							\$1.688	\$1.575	\$1.477	\$1.392	\$1.317	\$1.249	\$1.189	\$1.135	\$1.086	\$1.041	\$1.000	\$0.962	\$0.928	12
13	}								\$1.592	\$1.493	\$1.407	\$1.331	\$1.263	\$1.202	\$1.147	\$1.097	\$1.052	\$1.011	\$0.973	\$0.938	13
14	}									\$1.508	\$1.421	\$1.344	\$1.275	\$1.214	\$1.158	\$1.108	\$1.062	\$1.021	\$0.982	\$0.947	14
15	}										\$1.434	\$1.356	\$1.287	\$1.225	\$1.169	\$1.118	\$1.072	\$1.030	\$0.991	\$0.955	15
16	}											\$1.367	\$1.298	\$1.235	\$1.179	\$1.128	\$1.081	\$1.039	\$1.000	\$0.964	16
17	j												\$1.308	\$1.245	\$1.188	\$1.137	\$1.090	\$1.047	\$1.008	\$0.971	17
18	(													\$1.255	\$1.197	\$1.146	\$1.098	\$1.055	\$1.015	\$0.979	18
19	{														\$1.206	\$1.154	\$1.106	\$1.063	\$1.023	\$0.986	19
20	{															\$1.162	\$1.114	\$1.070	\$1.030	\$0.992	20
21	{																\$1.121	\$1.077	\$1.036	\$0.999	21
22	{																	\$1.083	\$1.043	\$1.005	22
23	{																		\$1.049	•	23
24	{								_											\$1.017	24
	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
į	Total c	hannel	s on rec	ulated	tiers																j

# Systems with 500 subscribers, 5 to 24 channels: Prices per Channel

Satellite	Total o	hannel	s on reg	gulated	tiers															_	Satellite
Channels	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Channels
0	\$2.552	\$2.180	\$1.909	\$1.701	\$1.536	\$1.403	\$1.292	\$1.199	\$1.119	\$1.049	\$0.989	\$0.935	\$0.887	\$0.845	\$0.806	\$0.771	\$0.739	\$0.710	\$0.684	\$0.659	1 0
1	\$2.552	\$2.180	\$1.909	\$1.701	\$1.536	\$1.403	\$1.292	\$1.199	\$1.119	\$1.049	\$0.989	\$0.935	\$0.887	\$0.845	\$0.806	\$0.771	\$0.739	\$0.710	\$0.684	\$0.659	1
2	\$2.796	\$2.389	\$2.091	\$1.863	\$1.683	\$1.537	\$1.416	\$1.313	\$1.226	\$1.150	\$1.083	\$1.024	\$0.972	\$0.925	\$0.883	\$0.845	\$0.810	\$0.778	\$0.749	\$0.722	2
3	\$2.949	\$2.520	\$2.206	\$1.966	\$1.776	\$1.621	\$1.493	\$1.385	\$1.293	\$1.213	\$1.143	\$1.081	\$1.026	\$0.976	\$0.932	\$0.891	\$0.855	\$0.821	\$0.790	\$0.762	3
4	\$3.063	\$2.617	\$2.291	\$2.042	\$1.844	\$1.684	\$1.551	\$1.439	\$1.343	\$1.260	\$1.187	\$1.122	\$1.065	\$1.014	\$0.968	\$0.926	\$0.888	\$0.853	\$0.821	\$0.791	4
5	\$3.155	\$2.695	\$2.360	\$2.103	\$1.899	\$1.734	\$1.597	\$1.482	\$1.383	\$1.297	\$1.222	\$1.156	\$1.097	\$1.044	\$0.997	\$0.953	\$0.914	\$0.878	\$0.845	\$0.815	5
6	1	\$2.761	\$2.417	\$2.154	\$1.946	\$1.776	\$1.636	\$1.518	\$1.416	\$1.329	\$1.252	\$1.184	\$1.124	\$1.070	\$1.021	\$0.977	\$0.936	\$0.899	\$0.866	\$0.834	6
7			\$2.467				•		•	•	\$1.278			•	•	•		\$0.918	\$0.883	\$0.851	7
8	ŀ			\$2.237		-					\$1.300	•				•		\$0.934	<b>\$</b> 0.899	\$0.867	8
9	[				\$2.052						\$1.321								\$0.913	\$0.880	9
10	1					\$1.900					\$1.339			-		•		•	\$0.926	\$0.892	10
11							\$1.772		•	•	\$1.356		-	•		•			\$0.938	\$0.904	11
12								\$1.663			\$1.372				•				\$0.948	\$0.914	12
13									\$1.568	-	\$1.386	•	•		•	•		•	\$0.958	\$0.924	13
14	1									\$1.486	\$1.400		•	•	•	•		•	\$0.968	\$0.933	14
15											\$1.413		-	•		•	\$1.056			\$0.941	15
16												\$1.347	-	-		•	\$1.066	•	\$0.985	\$0.950	16
17	Í												\$1.289				\$1.074	-	\$0.993	\$0.957	17
18														\$1.236	•	•	\$1.082	• -	•	\$0.964	18
19	1														\$1.188	•	\$1.090	•		\$0.971	19
20																<b>\$1.145</b>	\$1.097			•	20
21	1																\$1.104		\$1.021	\$0.984	21
22	1																	\$1.067	\$1.027	\$0.990	22
23																			\$1.033	•	23
24	<del> </del>					10	44	42	12	4.4	45	46	47	10	40	20			22	\$1.002	24
	5 Total c	6 honnol	, 	8 hotolur	9 tions	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
	Total	, nailite	s on reg	juialeu	uci 2																

### Systems with 250 subscribers, 25 to 100 channels: Prices per Channel

Satellite	Total c	hannel	s on reg	julated	tiers												 Satellite
Channels	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	Channels
0	\$0.646	\$0.552	\$0.483	\$0.430	\$0.389	\$0.355	\$0.327	\$0.303	\$0.283	\$0.265	\$0.250	\$0.237	\$0.224	\$0.214	\$0.204	\$0.195	 0
5	\$0.798	\$0.682	\$0.597	\$0.532	\$0.480	\$0.439	\$0.404	\$0.375	\$0.350	\$0.328	\$0.309	\$0.292	\$0.277	\$0.264	\$0.252	\$0.241	5
10	\$0.874	\$0.747	\$0.654	\$0.583	\$0.526	\$0.481	\$0.443	\$0.411	\$0.383	\$0.360	\$0.339	\$0.320	\$0.304	\$0.289	\$0.276	\$0.264	10
15	\$0.922	\$0.788	\$0.690	\$0.615	\$0.555	\$0.507	\$0.467	\$0.433	\$0.404	\$0.379	\$0.357	\$0.338	\$0.321	\$0.305	\$0.291	<b>\$</b> 0.279	15
20	\$0.958	\$0.819	\$0.717	\$0.639	\$0.577		\$0.485	•	•	•	\$0.371	\$0.351	•	\$0.317	\$0.303	\$0.290	20
25	\$0.987	\$0.843	\$0.738	\$0.658	\$0.594	•	•	•				-	-	\$0.327	\$0.312	\$0.298	25
30		\$0.863	\$0.756	\$0.674	\$0.608	\$0.556	\$0.512	•	•	•	•	•	-	\$0.334	\$0.319	\$0.305	30
35	ł		\$0.771	\$0.687	\$0.621	•	•	•	•		\$0.400	•		\$0.341	\$0.326	\$0.312	35
40	1			\$0.700	\$0.632	•	\$0.531	•	•	•	•	•		<b>\$</b> 0.347	\$0.332		40
45	l				\$0.642	-	\$0.540	-		-	-	-			\$0.337	•	45
50						\$0.594	\$0.547	•							\$0.341	•	50
55							\$0.554	•	•	•	\$0.424	•	•	•	\$0.346	•	55
60								\$0.520	-	•	•	•	•	•	\$0.350	•	60
65									\$0.491	•	\$0.434		•	• • • •	\$0.353	•	65
70										\$0.465	\$0.438	1.5		•		\$0.342	70
75											\$0.442	-	\$0.397	\$0.377	\$0.360		75
80												\$0.421			\$0.363		80
85	l												\$0.403		\$0.366	•	85
90	1													\$0.387	\$0.369		90
95	[														\$0.372	•	95
100	1															\$0.358	100
<del></del>	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	 
	Total o	hannel	s on reg	gulated	tiers												

# Systems with 500 subscribers, 25 to 100 channels: Prices per Channel

Satellite	Total c	hannel	s on reg	gulated	tiers		<u> </u>					_					Satellite
Channels	25	30	35	40	45	50	55	60	65	_70	75	80	85	90	95	100	Channels
0	\$0.636	\$0.543	\$0.476	\$0.424	\$0.383	\$0.350	\$0.322	\$0.299	\$0.279	\$0.262	\$0.246	\$0.233	\$0.221	\$0.211	\$0.201	\$0.192	 0
5	\$0.786	\$0.672	\$0.588	\$0.524	\$0.473	\$0.432	\$0.398	\$0.369	\$0.345	\$0.323	\$0.305	\$0.288	\$0.273	\$0.260	\$0.248	\$0.238	5
10	\$0.862	\$0.736	\$0.644	\$0.574	\$0.519	\$0.474	\$0.436	\$0.405	\$0.378	\$0.354	\$0.334	\$0.316	\$0.300	\$0.285	\$0.272	\$0.260	10
15	\$0.909	\$0.777	\$0.680	\$0.606	\$0.547	\$0.500	\$0.460	\$0.427	\$0.398	\$0,374	\$0.352	\$0.333	\$0.316	\$0.301	\$0.287	\$0.275	15
20	\$0.944	\$0.807	\$0.706	\$0.629	\$0.568	\$0.519	\$0.478	\$0.443	\$0.414	\$0.388	\$0.366	\$0.346	\$0.328	\$0.312	\$0.298	\$0.285	20
25	\$0.972	\$0.831	\$0.727	\$0.648	\$0.585	\$0.534	\$0.492	\$0.457	\$0.426	\$0.400	\$0.377	\$0.356	\$0.338	\$0.322	\$0.307	\$0.294	25
30		\$0.851	\$0.745	\$0.664	\$0.600	\$0.547	\$0.504	\$0.468	\$0.436	\$0.409	\$0.386	\$0.365	\$0.346	\$0.330	\$0.315	\$0.301	30
35			\$0.760	\$0.677	\$0.612	\$0.559	\$0.515	\$0.477	\$0.445	\$0.418	\$0.394	\$0.372	\$0.353	\$0.336	\$0.321	\$0.307	35
40				\$0.689	\$0.623	\$0.569	\$0.524	\$0.486	\$0.453	\$0.425	\$0.401	\$0.379	\$0.360	\$0.342	\$0.327	\$0.313	40
45	i				\$0.632	\$0.577	\$0.532	\$0.493	\$0.460	\$0.432	\$0.407	\$0.385	\$0.365	\$0.348	\$0.332	\$0.317	45
50						\$0.586	\$0.539	\$0.500	\$0.467	\$0.438	\$0.413	\$0.390	\$0.370	\$0.353	\$0.336	\$0.322	50
55							\$0.546	\$0.507	\$0.473	\$0.443	\$0.418	\$0.395	\$0.375	\$0.357	\$0.341	\$0.326	55
60								\$0.512	\$0.478	\$0.449	\$0.423	\$0.400	\$0.379	\$0.361	\$0.345	\$0.330	60
65									\$0.483	\$0.453	\$0.427	\$0.404	\$0.383	\$0.365	\$0.348	\$0.333	65
70										\$0.458	\$0.431	\$0.408	\$0.387	\$0.369	\$0.352	\$0.336	70
75											\$0.435	\$0.412	\$0.391	\$0.372	\$0.355	\$0.340	75
80												\$0.415	\$0.394	\$0.375	\$0.358	\$0.342	80
85													\$0.397	\$0.378	\$0.361	\$0.345	85
90														\$0.381	\$0.364	\$0.348	90
95															\$0.366	\$0.350	95
100																\$0.353	100
	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	
	Total c	hannels	s on reg	gulated	tiers								_				

# Systems with 750 subscribers, 5 to 24 channels: Prices per Channel

Satellite	Total o	hannel	s on re	gulated	tiers																Satellite
Channels	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Channels
0	\$2.539	<b></b>	•		•	•	•	-	•	•	\$0.984	\$0.930	\$0.883	\$0.840	\$0.802	\$0.767	\$0.736	\$0.707	\$0.680	\$0.656	0
1	\$2.539	·		\$1.692	•	•	-	-					•		\$0.802	\$0.767	\$0.736	<b>.</b>		+	1
2	T		•	\$1.854	•	•	-	-	•	-	-	•	•			\$0.841	\$0.806	\$0.774	\$0.745	\$0.718	2
3	\$2.935	7	·	\$1.956	•	•	•		•	•	•	•	•	\$0.971	\$0.927	\$0.887	\$0.850	*****		\$0.758	3
4													\$1.060				\$0.883		\$0.817	\$0.787	4
5	\$3.139												\$1.092				\$0.910		\$0.841	\$0.811	5
6		\$2.747	*	·			•		•		•		\$1.118	•		•	•		\$0.861	\$0.830	6
7			\$2.454			•	•		•	•		•	\$1.141		•		•	\$0.913	\$0.879	\$0.847	7
8				\$2.226		•	-		-			•	\$1.161		-	•	\$0.968	\$0.930	\$0.895	\$0.862	8
9					\$2.042	•	•	-	-		-	•	\$1.180		•			\$0.944	\$0.909	\$0.876	9
10						\$1.891	-	-	•	•	•	•	\$1.196	•			•		\$0.921	\$0.888	10
11							\$1./64						\$1.211			-			\$0.933	\$0.899	11
12								\$1.655	•		•	•	\$1.225	•	•	•	•	\$0.981		\$0.910	12
13	1								\$1.561		-		\$1.238			•	•		\$0.954	\$0.919	13
14	1									\$1.478			\$1.250			•	•	•	•	\$0.928	14
15											\$1.400					-	•	\$1.010	-		15
16												\$1.341	\$1.272				•	•		****	16
17	ł												\$1.283				\$1.069		\$0.988	\$0.952	17
18														\$1.230		•	\$1.077	•	\$0.996		18
19	1														\$1.102	•		\$1.042		•	19
20	1															<b>\$1.139</b>	-	\$1.049		\$0.973	20
21																	⊅1.0 <del>3</del> 9	\$1.056			21
22																		\$1.00Z	\$1.022		22
23	1																		\$1.028		23
24	-	6	7	-	0	10	11	12	13	14	15	16	17	18	19	20	21	22	23	\$0.997	24
	5	_	/ 	0 	diama	10	11	12	13	14	15	10	17	10	19	20	21	22	23	24	
	i otal c	mannel	s on re	gulated	uers																]